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11 Attorneys for Defendants WILLIAM ADAMS; STACY FERGUSON; ALLAN
PINEDA; and JAIME GOMEZ, all individually and collectively as the music
12 group THE BLACK EYED PEAS; will.i.am music, llc; TAB MAGNETIC
PUBLISHING; CHERRY RIVER MUSIC CO.; HEADPHONE JUNKIE
13 PUBLISHING, LLC; JEEPNEY MUSIC, INC.; EMI APRIL MUSIC, INC.

14 **UNITED STATES DISTRICT COURT**
CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION

16 BRYAN PRINGLE, an individual,
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Plaintiff,
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v.
19 WILLIAM ADAMS, JR.; STACY
FERGUSON; ALLAN PINEDA; and
20 JAIME GOMEZ, all individually and
collectively as the music group the
21 Black Eyed Peas; DAVID GUETTA;
FREDERICK RIESTERER; UMG
22 RECORDINGS, INC.; INTERSCOPE
RECORDS; EMI APRIL MUSIC,
23 INC.; HEADPHONE JUNKIE
PUBLISHING, LLC; WILL.I.AM.
24 MUSIC, LLC; JEEPNEY MUSIC,
INC.; TAB MAGNETIC
25 PUBLISHING; CHERRY RIVER
MUSIC CO.; SQUARE RIVOLI
26 PUBLISHING; RISTER EDITIONS;
and SHAPIRO, BERNSTEIN & CO.,
27
Defendants.
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Case No. SACV10-1656 JST (RZx)
Hon. Josephine Staton Tucker
Courtroom 10A
DECLARATION OF JUSTIN RIGHETTINI RE ADAMS DEFENDANTS' JOINDER TO MOTION FOR SANCTIONS AGAINST PLAINTIFF AND HIS COUNSEL PURSUANT TO FED. R. CIV. P. 11 BY DEFENDANTS SHAPIRO, BERNSTEIN & CO, INC., FREDERIC RIESTERER AND DAVID GUETTA
Date: April 16, 2012
Time: 10:00 A.M.
Dept.: 10A
Complaint Filed: October 28, 2010
Trial date: May 8, 2012

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DECLARATION OF JUSTIN RIGHETTINI

I, Justin Righettini, declare:

1. I am an attorney duly licensed to practice law before the courts of the State of California and all federal courts in the State of California. I am an attorney with the law firm of Bryan Cave LLP, counsel of record for Defendants WILLIAM ADAMS; STACY FERGUSON; ALLAN PINEDA; and JAIME GOMEZ, all individually and collectively as the music group THE BLACK EYED PEAS; will.i.am music, llc; TAB MAGNETIC PUBLISHING; CHERRY RIVER MUSIC CO.; HEADPHONE JUNKIE PUBLISHING, LLC; JEEPNEY MUSIC, INC.; and EMI APRIL MUSIC, INC.

2. Attached hereto as Exhibit "1" is a true and correct copy of the relevant portions of the Deposition Transcript of Bryan Pringle, dated August 24, 2011.

3. Attached hereto as Exhibit "2" is a true and correct copy of the relevant portions of the Deposition Transcript of William Adams, dated July 25, 2011.

4. Attached hereto as Exhibit "3" is a true and correct copy of the relevant portions of the Deposition Transcript of Dr. Alexander Norris, dated January 3, 2012.

5. Attached hereto as Exhibit "4" is a true and correct copy of the relevant portions of the Deposition Transcript of Dr. Alexander Stewart, dated January 4, 2012.

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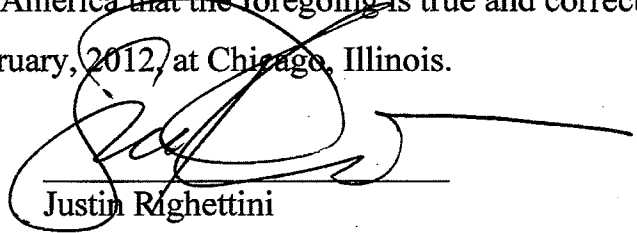
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6. Attached hereto as Exhibit "5" is a true and correct copy of an agreement between BEP Music, LLC, What a Music Limited, Frederic Riesterer, and David Guetta related to "I Gotta Feeling," dated September 28, 2008 and referenced in the Notice of Joinder filed herewith. This agreement has been produced in this matter as BEP-PR000666-701.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed this 6th day of February, 2012, at Chicago, Illinois.



Justin Righettoni

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**PROOF OF SERVICE
CCP 1013A(3) REVISED 5/1/88**

STATE OF ILLINOIS, COUNTY OF COOK

I am employed in the County of Cook, State of Illinois. I am over the age of 18 and not a party to the within action. My business address is: 161 North Michigan Avenue, Suite 4300, Chicago, IL 60601.

On February 6, 2012, I served the foregoing document(s) described as:

**DECLARATION OF JUSTIN RIGHETTINI RE ADAMS
DEFENDANTS' JOINDER TO MOTION FOR SANCTIONS AGAINST
PLAINTIFF AND HIS COUNSEL PURSUANT TO FED.R.CIV.P. 11 BY
DEFENDANTS SHAPIRO, BERNSTEIN & CO., INC., FREDERIC
RIESTERER AND DAVID GUETTA**

on all interested parties in this action by placing a true copy the original thereof enclosed in sealed envelopes addressed as follows:

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BY CM/ECF NOTICE OF ELECTRONIC FILING: I caused said document(s) to be served by means of this Court's electronic transmission of the Notice of Electronic filing through the Court's transmission facilities, to the parties and/or counsel who are registered CM/ECF Users set forth in the service list obtained from this Court.

BY MAIL - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. Postal Service on that same day with postage thereon fully prepaid at Irvine, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

BY OVERNIGHT DELIVERY - Depositing the above document(s) in a box or other facility regularly maintained by FedEx in an envelope or package designated by FedEx with delivery fees paid or provided for.

BY PERSONAL DELIVERY - I caused such envelope to be hand delivered to the offices of the addressee.

BY EMAIL - I caused a true copy of the foregoing document(s) to be served by electronic email transmission at the time shown on each transmission, to each interested party at the email address shown above. Each transmission was reported as complete and without error.

FEDERAL - I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on February 6, 2012, at Chicago, Illinois.



Carol A. Duracka

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